**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Mailing Online Service) Docket No. MC98-1

**OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY
(OCA/USPS-T1-56-57)
(November 3, 1998)**

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and

requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby
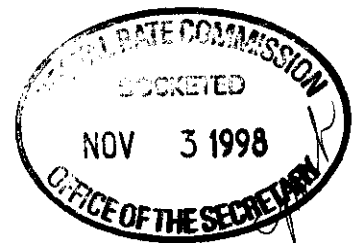
incorporated by reference.

Respectfully submitted,

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich
Acting Assistant Director

OCA/USPS-T1-56.   Please refer to your response to interrogatory OCA/USPS-T1-18.

The computer code provided in that response does not appear to relate to the question.

(I.e., it is the same code as provided in response to interrogatory OCA/USPS-T1-17g.)

Please verify that you provided the intended code. If you did not, please provide the
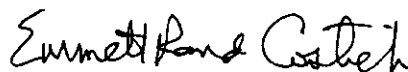
requested code.

OCA/USPS-T1-57.   Please refer to your response to interrogatory OCA/USPS-T1-22,

parts c. and d. You state that address list files are retained for at least 30 days and that

they are "tagged" with an expiration date.

a.   Can the submission date and time of a job be deduced from the expiration date?

       If not, why not?

b.   Were all stored address list files with the same expiration date submitted on the

       same date? If not, why not?

c.   Can stored address list files be "tagged" with a submission date and time? If not,

       why not?

d.   Can the date of transmission of an address list file to print sites be deduced from

       the date and time of submission of a job? If not, why not?

e.   Can stored address list files be "tagged" with the date of transmission to a print

       site? If not, why not?

f.   Please confirm that co-mingled presort batches are "closed" at 2:00 P.M. eastern

       time on the date of transmission to the printer. If you do not confirm, please

       explain.

g. Can stored address list files be "tagged" with a subclass/job-type/page-count identifier? If not, why not?

h. If stored address list files *were* identified by date and time of transmission to a print site and by a subclass/job-type/page-count code, could code be written that would determine and report (after the fact) the degree of batching and the depth of presorting achieved on a given date? If not, why not? Please provide documentary verification (e.g., correspondence from the system developer) of your response.

i. Please obtain from the system developer, and provide as a response to this interrogatory, a report on the feasibility of the procedure described in part h. of this interrogatory for determining depth of sort on a batch-by-batch basis by date.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
November 3, 1998